

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

Lawrence Charles,
Plaintiff,

1:24 CV 368

v.

Civil Action No.

Loudoun Times-Mirror,
Defendant,
and

Ogden Newspapers,
Defendant,
and

Evan Goodenow,
Defendant.

Introductory Statement

1. This is an action for damages sustained by a Citizen of the United States against a Newspaper Company, media company, blog who deliberately published a news article that slandered and defame a local blogger and entertainer. The influential blogger has a huge following on social media with more than 250,000 followers and over 300 million views and streams across his social media and web platforms.

Jurisdiction

2. This action is brought Pursuant to Va Code Ann. § 8.01-247.1, Va Code Ann. § 8.01-45, and Va Code Ann. 18.2-417
3. The Jurisdiction of this Court is predicated on 28 USC § 1332 and 28 USC § 1367

Parties

4. Plaintiff Lawrence Charles is a resident of Loudoun, and at all times relevant to the allegations of this complaint was a resident of Loudoun County and a citizen of the United States.
5. Defendant, Loudoun Times-Mirror, is a newspaper/Publishing/media Company located in Loudoun County, with its Principal office address, 110 East Market Street, Suite 101, Leesburg, Virginia 20176. At all times relevant hereto, said Defendant published article and was the employer of Defendant Evan Goodenow.
6. Defendant Ogden Newspapers, is the company which owns Loudoun Times-Mirror, whose principal address is presently unknown to Plaintiff. At all times relevant hereto, Defendant Ogden Newspapers own Loudoun Times-Mirror.
7. Defendant Evan Goodenow, is an adult citizen of the County of Loudoun, Virginia, whose residential address is presently unknown to Plaintiff. At all times relevant hereto, Defendant wrote article, and was employed at Loudoun Times-Mirror.

Factual Allegations

8. On December 27, 2023 Defendant Goodenow and Defendant Times-Mirror Published an article, titled "Homeless Man with a History of Violence". The article then states, "Mr. Charles was accused of beating his intimate partner, and a sex worker." But states, "All charges were dismissed".
9. Plaintiff is slandered many times throughout the article, and most of the article is meant to cast Plaintiff in a bad light. Plaintiff actually got cut by a woman who was a sex worker who robbed Plaintiff, Plaintiff never paid for sex.
10. Plaintiff Charles is an entrepreneur, blogger, musician, software developer. The music aspect of his life is what makes Plaintiff the most money. So with that being said, his image is very important. Plaintiff has done marketing for companies like Target, Inova, TJ Maxx, Walmart. Plaintiff has also market entertainers like Jim Jones, Sean Kingston, Fat Joe, Florida as well.
11. The fact that the Loudoun Times Mirror Published a very untruthful article at the request of detective Katie Mitchell, who is employed by the Loudoun County Sheriff, who is currently in a federal civil litigation with Plaintiff shows this was meant to give the Loudoun County Sheriff Office an advantage in court. Detective Katie Mitchell knew the alleged victim in the active case had recanted her statement and said, "Plaintiff was innocent". The alleged victim told detective Mitchell, "I never asked you to go get charges".
12. Detective Katie Mitchell knew Plaintiff owned several business in the area and was looking to embarrass/humiliate the Plaintiff, and reached out to an associate in the Loudoun Times-Mirror to help her accomplish her goal is very suspect. Plaintiff has residence in Loudoun, VA, Ca.
13. As a result of article: Plaintiff has loss revenue, has been made fun of, ridiculed, and the article has been spread throughout his intimate circle. The Plaintiff has been subjected to tauntins and teasing and ostracism from peers causing severe embarrassment, humiliation, mental anguish and psychological and emotional distress. Plaintiff has loss over 20K followers as a result.

First Cause of Action

14. Paragraph 1-14 are hereby incorporated by reference as though fully set forth here.

The actions of the Defendants to knowingly spread a lie about Plaintiff then publish it on website and newspaper, about Plaintiff being homeless, show malice and intent to destroy his character in the face of his peers and community. Defendants defamed and slandered according to Va Code Ann. § 8.01-247.1, Va Code Ann. § 8.01-45, and Va Code Ann. § 18.2-417

Second Cause of Action

15. Paragraph 1-15 are hereby incorporated by reference as though fully set forth here.

The actions of the Defendants causing Plaintiff to be shunned, embarrassed and humiliated. Defendants actions cause loss of revenue to his brand and business. Defendants Defamed and Slandered Plaintiff according to Va Code Ann. § 8.01-247.1, Va Code Ann. § 8.01-45, and Va Code Ann. § 18.2-417

Third Cause of Action

16. Paragraph 1-16 are hereby incorporated by reference as though fully set forth here.

The actions of the Defendants and decision to publish a misleading article, and accusing the Plaintiff of being a sex worker. When the opposite is true, led to relationship problems with Plaintiff fiance. Defendants defamed and slandered Plaintiff according to Va Code Ann. § 8.01-247.1, Va Code Ann. § 8.01-45, and Va Code Ann. § 18.2-417

WHEREFORE, Plaintiff Pray for the following relief:

- a. Compensatory damages in the amount of \$120,000,000.00
- b. Punitive damages in the amount of \$120,000,000.00
- c. Such other and further relief as the Court may deem appropriate under the Circumstances

Respectfully Submitted



Lawrence Charles Prose

Plaintiff

2001 Mill Road

Alexandria, Virginia

Inmate # A 02 18162